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UBER TECHNOLOGIES, INC., RASIER, LLC,  
And RASIER-CA, LLC

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

IN RE: UBER TECHNOLOGIES, INC.,  
PASSENGER SEXUAL ASSAULT  
LITIGATION

This Document Relates to:

*Jessi Watt v. Uber Technologies, Inc., et al.*; 3:25-cv-04704-CRB

Case No. 3:23-md-03084-CRB

**DECLARATION OF CHRISTOPHER V.  
COTTON IN SUPPORT OF DEFENDANTS'  
OPPOSITION TO MOTION TO  
WITHDRAW AS COUNSEL OF RECORD**

Judge: Honorable Charles R. Breyer

**DECLARATION OF CHRISTOPHER V. COTTON**

I, Christopher V. Cotton, declare pursuant to 28 U.S.C. § 1746:

1. I am over the age of 18 and am a resident of Kansas City, Missouri. I respectfully submit this declaration in support of Defendants Uber Technologies, Inc.’s, Rasier, LLC’s, and Rasier-CA, LLC’s (collectively, “Defendants”) opposition to Peiffer Wolf Carr Kane Conway and Wise, LLP’s (“Peiffer Wolf”) motion to withdraw as counsel for Plaintiff J.W.

2. I am a partner at the law firm of Shook, Hardy & Bacon L.L.P., representing Defendants in this MDL as well as in Judicial Council Coordination Proceeding No. 5188, *In Re: Uber Rideshare Cases*, Case No. CJC-21-005188 (the “JCCP”). I am a member in good standing of the Bar of the State of Iowa, the Bar of the State of Missouri, and the Bar of the State of Wisconsin. I make this declaration based upon matters within my own personal knowledge. If called as a witness, I could and would competently testify to the matters set forth herein.

3. On behalf of Plaintiff J.W., Peiffer Wolf submitted a Plaintiff Fact Sheet (PFS) on July 3, 2025, but failed to submit an accompanying verification to the PFS.

4. On July 18, 2025, counsel for Uber communicated to Peiffer Wolf via a PFS Deficiency Notice that Plaintiff J.W.’s PFS was deficient for lack of verification.

5. On August 19, 2025, Peiffer Wolf served an Amended Plaintiff Fact Sheet on behalf of Plaintiff J.W., again without a verification.

6. On December 3, 2025, counsel for Uber emailed the Peiffer Wolf firm to provide notice pursuant to Amended PTO 10, Section 9(b), that Plaintiff’s most recent PFS was materially deficient due to Plaintiff’s failure to serve a verification, and to request a meet and confer by Friday, December 5, 2025.

7. On December 4, 2025, Peiffer Wolf emailed counsel for Uber in response to its December 3, 2025 email, indicating that Peiffer Wolf intended to withdraw as counsel in Plaintiff J.W.’s case.

1           8.       On December 5, 2025 at approximately 4:00 PM Pacific, I met and conferred with  
2 attorneys from Peiffer Wolf, who again stated that the firm intended to withdraw as counsel for J.W.  
3 in this case. I stated that Uber would oppose the motion to withdraw.  
4

5           I declare under penalty of perjury under the laws of the State of Missouri that the foregoing is  
6 true and correct. Executed on December 11, 2025, in Kansas City, Missouri.  
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8                               **SHOOK, HARDY & BACON L.L.P.**

9                               /s/ Christopher V. Cotton

10                              CHRISTOPHER V. COTTON  
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